Request No. Staff 2-5

All – If notified by local officials (e.g., police, fire) of an emergency, do you immediately dispatch a crew/technician to the scene? If not, why not? How is the decision made (based on what information) to send appropriate personnel?

Response:

Yes.

The standby crew will respond immediately to any emergency upon notification by customers or local officials. Supervisory personnel may also respond, as appropriate, depending on the circumstances.

All calls are treated as emergencies until otherwise classified.

Request No. Staff 2-6

All - Please identify any protocol or procedures used by the utility for notification of the emergency management personnel of a licensing municipal, including but not limited to fire or police personnel, or of the state, in the event of an emergency, that pertains to the utility poles in the rights of way.

Response:

Normally, we are notified of emergencies involving utility poles in the rights of way by local emergency response personnel, not the reverse. It would be unusual to respond to such an emergency in which fire or police personnel have not already been notified, or are not on the scene.

In the event that we respond to an emergency situation where municipal emergency response personnel are not present, we would notify police or fire as appropriate. The protocol is identical whether involving utility poles in the public right of way, or any other public emergency. During regular hours, the responding crew radios the local operations center, and requests notification of appropriate emergency management personnel (e.g., police, fire). After hours, the responding crew notifies the supervisor on call, or the Unitil Customer Service Center, and requests notification of appropriate emergency management personnel.

Request No. Staff 2-7

All - Please identify in the protocol or procedures described in #2-6, above, the state and local departments and/or individuals to be notified, the timing for such notification during such an emergency and the sequence of departments or individuals notified.

Response:

Please see Response to Staff 2-6.

There is no specific protocol or procedure as such events do not happen on a regular basis. Where required, the timing would be immediate. The notification would be to the local police or fire department, or both, as appropriate.

Request No. Staff 2-8

All – State and municipal emergency personnel direct most of their calls, during pole emergencies, to the electric companies. How might the utilities ensure that emergency personnel contact the Verizon ERC, as well as the electric companies, during these emergencies?

Response:

Verizon should ensure that all state and local emergency officials have the correct emergency number(s) to the Verizon ERC. In addition, Verizon should conduct annual training or communication, as required, to ensure that state and local emergency personnel are familiar with emergency procedures and protocols involving utility response.

Each year, Unitil reviews its emergency response procedures, and hosts a meeting to review these procedures with municipal emergency response personnel. Invitations are extended to appropriate police, fire, and civil defense personnel of all the municipalities in Unitil's service territory. Unitil ensures that all municipalities have direct numbers for reporting emergencies, and are familiar with safety and emergency response protocols. In the event that invitees do not attend the meeting, Unitil follows up with written correspondence providing direct numbers and other applicable information. Verizon could conduct similar meetings with state and municipal emergency officials. These meetings could be coordinated, and conducted jointly with the electric companies.

Finally, the electric companies can remind local emergency response personnel to immediately contact the telephone company each time an emergency involving a broken pole occurs in Verizon's maintenance area.

Request No. Staff 2-9

All – How do the electric companies, normally first on-scene to a pole emergency, feel about continuing to contact the Verizon ERC with the initial damage assessment if state and emergency personnel include Verizon as one of their initial contacts?

Response:

This specific issue was covered in an operational meeting between Unitil and Verizon on May 12, 2005. In that meeting, Verizon acknowledged that their ERC relies on the responding electric crew to make field determinations before calling in Verizon personnel. For example, the ERC may rely on electric company personnel to determine if the pole needs to be replaced, and to communicate the size of the pole. In that meeting, Unitil emphasized that it is not the electric company's responsibility to be the "first responder" to broken poles in Verizon's maintenance area, or to provide the Verizon ERC with on-site information about the pole. Verizon should be responding just as the electric company responds. This continues to be Unitil's position. Verizon should respond immediately to emergencies in its maintenance area when notified by state and emergency personnel, or by the electric company.

The practice of waiting for the electric company to act as the first responder is unacceptable for two reasons:

- It needlessly delays restoration and emergency response in situations where a Verizon crew is required to place the pole.
- It represents cost shifting from the telephone company to the electric company.
 Verizon saves callouts by relying on the electric company's initial damage assessment. However, the electric company incurs extra costs when crews wait on-site (on overtime) for the Verizon crew to respond.

At this meeting, Verizon tentatively agreed to a change in practice pending discussion with Marianne Ryan. Verizon tentatively agreed to automatically dispatch a crew for reports of a broken pole in their maintenance area.

Subsequent to the meeting, however, we were told by Ryan Taylor, Area Operations Manager, that Verizon would not adopt this practice.

Request No. Staff 2-11

All – Would adherence to routines suggested in questions #2-8 & #2-9 eventually eliminate the need for local agreements?

Response:

No. Although Unitil believes that adherence to routines suggested in #2-8 & #2-9 would likely result in expedited response and restoration of service, local agreements would still be required to address non-performance and various other matters not related to emergency response.

Request No. Staff 2-22

All – Please provide the response times from Verizon garages in Greenland and Somersworth for the last six months? Please provide the number of times when Verizon was not available to respond and identify each event as accurately as possible.

Response:

Date	Location	First Verizon notification (approximate)	Verizon arrive on job site (approximate)	Elapsed Time
12/01/2005	Rt. 84, Hampton Falls	2:40	5:00	140 minutes
01/15/2006	Hobbs Road, Kensington	14:15	16:45	150 minutes
1/16/2006	Rt. 88, Hampton Falls	16:30	18:45	135 minutes

In the last six months, there was no instance in which Verizon was unavailable to respond for the areas covered by these two garages.

Data is not all inclusive as Unitil had two (2) other off-hours emergency broken pole calls, but response time information was not recorded.

Person Responsible: Scott D. Wade **Date:** February 2, 2006.

Request No. Staff 2-30

All - Please provide for the last six months all documentation associated with keep cost work orders involving the replacement and or repair of poles and conduit due to motor vehicle or construction accidents in New Hampshire. The documentation should include the work order and final billing invoice and clearly identify the incident location, date, crew hours and the charges for time and material. It is requested that the information be provided in chronological order as determined by the specific date of the event causing the damage.

Response:

Please see Attachment Staff-Unitil 2-30.

Person Responsible: Scott D. Wade Date: February 2, 2006

Request No. Staff 2-34

All - With respect to Staff question 1-19, please identify the steps that are taken to notify a licensing municipality of changes in the field that affect the terms or conditions of the license granted for that specific pole location, including, but not limited to the location of the pole itself.

Response:

Unitil does not notify a licensing municipality of changes in the field, nor are we aware of any requirement to do so, except for those cases where a pole has been relocated at a distance greater than 5 feet. Such relocations would follow the same steps as described in Unitil's response to Staff question 1-19, and also include a step to re-license the pole with the licensing municipality. The re-licensing process includes mailing a joint pole petition to the co-owner of the pole, which is then sent to the licensing municipal for signature, and returned to the custodian.

Request No. Staff 2-35

All - With respect to Staff question 1-37, please state the procedure used within the utility to respond to a notice of removal received from a municipality or the state pursuant to RSA 231:177 through 182 inclusive.

Response:

Unitil is not aware of receiving a notice of removal pursuant to RSA 231:177 through 182, inclusive.

Unitil enjoys good working relationships with all the municipals in their service territory. We endeavor to cooperate with each municipal with respect to our facilities in the rights of way, and are not aware of any problems or complaints. Should the need arise for discussion on our facilities, the procedure utilized is informal, and usually involves a brief telephone conversation between utility personnel and the appropriate municipal officials. Furthermore, on occasion, the municipal has asked Unitil to call our contacts at Verizon to assist in pole relocation and/or removal, and we have complied when requested.

Request No. Staff 2-36

All - With respect to Staff question 1-1, please identify whether, at any time covered by data requests in this proceeding, the Commission has ordered specific emergency response procedures to be implemented, and if so how the costs of such implementation are recovered.

Response:

Unitil is not aware of any Commission orders to implement specific emergency response procedures during the time frame covered by the data requests in this proceeding.